

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Desiree Arnold,

Plaintiffs,

**DECLARATION**

-against-

No. 20 CV 5666

NYC Health and Hospitals Corp., Sheldon McLeod,  
Geralda Xavier, Steven Pulitzer, and Nicole Constantine,

Defendants.

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I, **Nicole Constantine**, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an individually named defendant in the above-captioned matter, which was originally filed in the Supreme Court of the State of New York, County of Kings, under Index No. 520965/2020.

2. I consent to co-defendant New York City Health and Hospitals Corporation's application to remove the instant matter to the United States District Court of the Eastern District of New York.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
November 20, 2020

By: Nicole Constantine  
Nicole Constantine

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
Desiree Arnold,

Plaintiffs,

**DECLARATION**

-against-

No. 20 CV 5666

NYC Health and Hospitals Corp., Sheldon McLeod,  
Geralda Xavier, Steven Pulitzer, and Nicole Constantine,

Defendants.

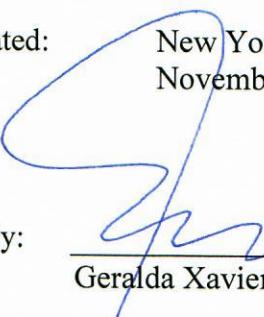
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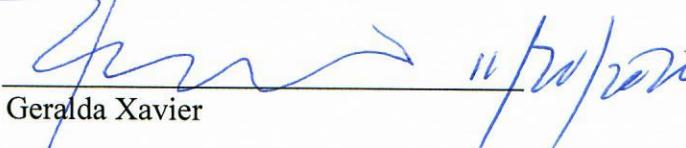
I, **Geralda Xavier**, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury,  
that the following is true and correct:

1. I am an individually named defendant in the above-captioned matter, which  
was originally filed in the Supreme Court of the State of New York, Count of Kings, under Index  
No. 520965/2020.

2. I consent to co-defendant New York City Health and Hospitals  
Corporation's application to remove the instant matter to the United States District Court of the  
Eastern District of New York.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated:   
New York, New York  
November \_\_, 2020

By:   
Geralda Xavier

11/20/2020

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

Desiree Arnold,

Plaintiffs,

**DECLARATION**

-against-

No. 20 CV 5666

NYC Health and Hospitals Corp., Sheldon McLeod,  
Geralda Xavier, Steven Pulitzer, and Nicole Constantine,

Defendants.

----- X

I, **Steven Pulitzer**, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an individually named defendant in the above-captioned matter, which was originally filed in the Supreme Court of the State of New York, Count of Kings, under Index No. 520965/2020.

2. I consent to co-defendant New York City Health and Hospitals Corporation's application to remove the instant matter to the United States District Court of the Eastern District of New York.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
November 26, 2020

By: Steven Pulitzer, wd  
Steven Pulitzer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Desiree Arnold,

Plaintiffs,

**DECLARATION**

-against-

No. 20 CV 5666

NYC Health and Hospitals Corp., Sheldon McLeod,  
Geralda Xavier, Steven Pulitzer, and Nicole Constantine,

Defendants.

----- X

I, **Sheldon McLeod**, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an individually named defendant in the above-captioned matter, which was originally filed in the Supreme Court of the State of New York, County of Kings, under Index No. 520965/2020.

2. I consent to co-defendant New York City Health and Hospitals Corporation's application to remove the instant matter to the United States District Court of the Eastern District of New York.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
November 20, 2020

By:

  
\_\_\_\_\_  
Sheldon McLeod